

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

D.A.N. JOINT VENTURE III, L.P., as Assignee)	
of Bankruptcy Trustee Richard M. Fogel, the)	
Chapter 7 Trustee for the Bankruptcy Estate of)	
Debtor Nicholas S. Gouletas,)	
)	
Plaintiff,)	
)	
v.)	No. 1:18-cv-00349
)	
DOROTHEA TOURIS, et al.,)	Hon. Robert M. Dow
)	Mag. Judge Young B. Kim
Defendants.)	

MOTION FOR EXTENSION OF TIME

Defendant JAMES PAUL, by his attorneys, for his motion for extension of time to answer or otherwise plead to the Complaint in this cause, states as follows:

1. Plaintiff seeks to hold Mr. Paul liable for certain alleged fraudulent transfers and other activities by or related to Nicholas S. Gouletas, the Debtor in Case No. 16-01335 currently pending before Hon. Timothy A. Barnes in the United States Bankruptcy Court for this District.

2. Mr. Paul just retained Richard H. Fimoff, Robert J. Trizna, and Robbins, Salomon & Patt, Ltd. as his counsel in this matter.

3. Because of the number (7 counts) and complexity of the claims against Mr. Paul and 21 other named defendants, Mr. Paul's counsel believe they will need additional time to properly investigate the claims to determine whether to answer or otherwise plead; and to then prepare and file an answer or the appropriate motion.

4. This motion is not interposed for delay or any other improper purpose, and the relief requested with not unduly delay these proceeding or unduly burden Plaintiff.

5. This is Mr. Paul's first request for an extension of time to answer or otherwise

plead.

WHEREFORE, Defendant James Paul prays that this Court: (a) grant this motion; (b) grant him to and including March 26, 2018, to answer or otherwise plead to the Complaint; and (c) such other relief as this Court deems appropriate.

JAMES PAUL

By: /s/ Robert J. Trizna
One of his attorneys

Richard H. Fimoff
rfimoff@rsplaw.com
Robert J. Trizna
rtrizna@rsplaw.com
ROBBINS SALOMON & PATT, LTD.
180 N. LaSalle Street
Suite 3300
Chicago, Illinois 60601
(312) 782-9000

14W7945